

UNITED STATES DISTRICT COURT
DISTRICT COURT OF MARYLAND

KRAVITZ, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
COMMERCE, *et al.*,

Defendants.

Civil Action No. 8:18-cv-01041-GJH

Hon. George J. Hazel

**PLAINTIFFS' MOTION FOR LEAVE
TO FILE A THIRD AMENDED
COMPLAINT**

Plaintiffs respectfully move the Court, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, for leave to file an amended complaint, a copy of which is attached hereto as Exhibit 1. A redlined version of the proposed Third Amended Complaint that illustrates the changes from the Second Amended Complaint is attached hereto as Exhibit 2. The proposed Third Amended Complaint maintains the counts and allegations against the same defendants from the Second Amended Complaint but adds a claim that Defendants violated Plaintiffs' rights as guaranteed by the Due Process Clause of the Fifth Amendment. Pursuant to Local Rule 103.6(d), Plaintiffs attempted to obtain consent from Defendants, but Defendants did not consent.

For the reasons stated in the accompanying memorandum of law, Plaintiffs respectfully request that their motion for leave to file the proposed Third Amended Complaint be granted.

December 4, 2018

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By: /s/ Daniel Grant

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CERTIFICATE OF SERVICE

I certify that on this 4th day of December, 2018, I caused a copy of the foregoing Motion for Leave to File a Third Amended Complaint and all accompanying filings to be sent to all parties receiving CM/ECF notices in this case.

COVINGTON & BURLING LLP

By: /s/ Daniel Grant

Daniel Grant (Bar Number: 19659)